

ADEQ 2010 Air Program Final Report

	Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
	1	<p>Work with local area stakeholders to support innovative, voluntary, early action initiatives.</p> <p>ADEQ EOY: ADEQ's Reduce Emissions from Diesels ("Go RED!") provides grant funding to public and private entities and non-profit organization in Arkansas reduce diesel emissions. The Division participates in Blue Skyways meetings and conference calls.</p> <p>EPA EOY: We appreciate the State's efforts to reduce diesel emissions through the voluntary Go RED program.</p>	Periodic planning calls and end-of-year review.	Ongoing
	2	<p>Begin drafting Non-attainment SIPs based on 2010 federal designations.</p> <p>ADEQ EOY: There are currently no non-attainment areas in Arkansas, nor will any non-attainment areas be added as a result of 2010 federal designations</p> <p>EPA EOY: We concur and appreciate the State's commitment to SIP development.</p>	Periodic planning calls and end-of-year review	Ongoing
	3	<p>Submit 111(d) Plan or a Negative Declaration for Hospital/Medical/Infectious Waste Incinerators and municipal solid waste landfills.</p> <p>ADEQ EOY: ADEQ considering Negative Declaration for HMIWI and continuing negotiations with R6 on Landfill submittals.</p> <p>EPA EOY: We appreciate the State's efforts to update the 111(d)/129 rules</p>	Periodic planning calls and end-of-year-review	3/30/10

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	4	<p>Develop a schedule for adoption of rules, submittal of negative declarations, or requests for delegation of other solid waste incinerators, commercial and industrial solid waste incineration (CISWI) units and small municipal waste combustion units.</p> <p>ADEQ EOY: ADEQ conducting further review of these Rules and scheduling appropriate rulemaking.</p> <p>EPA EOY: We appreciate the State's efforts to update the 111(d)/129 rules</p>	Periodic planning calls and end-of-year-review	9/30/10
	5	<p>Prepare to address 110(a)(2) requirements for ozone and PM2.5.</p> <p>ADEQ EOY: The Division is awaiting PM2.5 test methods to revise the PSD program. CAIR remains in effect in Arkansas until such time as the Transport Rule is in effect.</p> <p>EPA EOY: A federal register notice on PM2.5 test methods was signed December 1, 2010, (see docket EPA-HQ-OAR-2008-0348 in regulations.gov or www.epa.gov/ttn/emc/methods/method202.html).</p>	Periodic Planning Calls and end-of-year review	09/30/10
	6	<p>Continue to work with the Region on issues related to submitted regional haze SIPs</p> <p>ADEQ EOY: RH SIP submitted and subject to EPA review.</p> <p>EPA EOY: EPA acknowledges ADEQ's work in developing and submitting this SIP. EPA is currently reviewing.</p>	Periodic Planning calls and end-of-year review	9/30/10

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	7	<p>Submit revisions to NSR SIP rules, within the time allowed by Federal rules.</p> <p>ADEQ EOY: GHG Tailoring Rule regulation changes to Regs. 18, 19, and 26 have been drafted. ADEQ will not meet May 16, 2011, deadline for incorporation of PM2.5 in PSD program. See item 5 above.</p> <p>EPA EOY: We appreciate the State's work on the GHG tailoring rule. Region 6 is in receipt of the September 14, 2010, letter from Teresa Marks on the PM2.5 and PSD issue.</p>	SIP submittal	As needed
	8	<p>Prepare and submit revisions to the SIP as necessary and appropriate.</p> <p>ADEQ EOY: Currently due SIP submittals have been submitted to EPA for review.</p> <p>EPA EOY: We appreciate the State's efforts to develop SIPs and protect air quality.</p>	Periodic Planning Calls and end-of-year review	As needed
	9	<p>Implement applicable requirements of the approved SIP.</p> <p>ADEQ EOY: All changes to the approved SIP have been implemented.</p> <p>EPA EOY: We appreciate the State's work to implement the SIP.</p>	End-of-year review	Ongoing

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	10	<p>Prepare for recommendations on designations for revised lead NAAQS, pending final federal regulation.</p> <p>ADEQ EOY: ADEQ anticipates no change to initial recommendations</p> <p>EPA EOY: All of Arkansas counties were classified as "Unclassifiable" with respect to the new lead NAAQS, in the first round of designations. EPA does not anticipate any changes in this classification due to the fact that Arkansas does not have sources that emit more than 1 ton of lead per year and therefore no source monitors are required. EPA appreciates the State's commitment to improving and maintaining its air quality.</p>	Input to Governor's Office	TBD
	11	<p>Participate in the Blue Skyways Collaborative, its Task Force, Technical Workgroups, meetings, and projects, among others</p> <p>ADEQ EOY: The Division actively participates in Blue Skyways webinars and conference calls.</p> <p>EPA EOY: EPA and the Blue Skyways Collaborative appreciate the State's participation in this regional program.</p>	End-of-year review	Ongoing
	12	<p>Review and concur on conformity determination revisions for non-attainment and maintenance areas for transportation related criteria pollutants (e.g., ozone, CO, PM2.5, PM10).</p> <p>ADEQ EOY: Conformity determinations not currently required.</p> <p>EPA EOY: No conformity determinations were developed in Arkansas during FY2010. EPA appreciates the State's commitment to the interagency consultation process.</p>	Conformity determination	As necessary

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	Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
	13	<p>Submit draft, proposed, and/or final SIPs, equivalency demonstrations, and/or delegation requests in response to revisions to NSR rules, and respond to EPA questions/concerns regarding SIP packages in a timely manner.</p> <p>ADEQ EOY: ADEQ will work closely with regional EPA contacts to provide efficient and effective working relationships</p> <p>EPA EOY: We appreciate the State's efforts to develop SIPs and protect air quality.</p>	End-of-year review	9/30/10
	14	<p>Implement delegated or approved section 111(d) and 129 standards, as appropriate, for major sources.</p> <p>ADEQ EOY: OK</p> <p>EPA EOY: We appreciate the State's efforts to update the 111(d) and 129 rules.</p>	Periodic Permitting/Planning calls and end-of-year review	9/30/10
	15	<p>Evaluate whether State wants delegation and implement toxic requirements based on State determination and delegation of standards, as needed, including the residual risk and the area source programs.</p> <p>ADEQ EOY: OK</p> <p>EPA EOY: State is currently requesting delegation.</p>	End-of-year review	09/30/10
	16	<p>Evaluate whether State will adopt and request delegation of approved Toxics standards for major sources, area sources, and residual risk. If standards are delegated, implement delegated or approved toxics requirements, as appropriate.</p> <p>ADEQ EOY: OK</p> <p>EPA EOY: R6 will work with ADEQ to achieve delegation of specific toxics standards.</p>	In response to specific requests from OAQPS or Region 6	As appropriate

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	Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
	17	<p>Review air quality reports and take appropriate actions dealing with new areas violating attainment of any of the NAAQS.</p> <p>ADEQ EOY: ADEQ will report attainment status and make designation recommendations as required</p> <p>EPA EOY: We appreciate the State's work to ensure that the NAAQS are maintained. ADEQ should submit data of any exceedences for 2010-1011.</p>	Periodic planning calls and end-of-year review	Ongoing
	18	<p>Prepare a Transportation Conformity SIP package and a schedule for preparation of a General Conformity SIP package.</p> <p>ADEQ EOY: None required at this time</p> <p>EPA EOY: We appreciate the State's contributions to the development of the Little Rock area interagency MOA.</p>	Submission of SIP / Schedule	9/30/10
	19	<p>Resubmit 111(d) Plan for Municipal Solid Waste Landfills or Submit a Negative Declaration.</p> <p>ADEQ EOY: See 3 above</p> <p>EPA EOY: We appreciate the State's efforts to update the 111(d)/129 rules</p>	Periodic planning calls and end-of-year-review	3/30/10

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	Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
	20	<p>Report real time ozone to AirNOW for cities required to report the AQI (state/local only).</p> <p>ADEQ EOY: OK</p> <p>EPA EOY: We appreciate ADEQs support for the AirNOW system for ozone and PM2.5. We appreciate ADEQs efforts to consider expanding air quality reporting and forecasting to additional cities, including particle pollution forecasting for AirNOW.</p>	AirNow	Ongoing [present target is within 20 minutes; long-term goal is 5 minutes]
	21	<p>Certify 2008 NAAQS pollutant data in AQS and provide supporting documentation by Target for QA data is 75% of checks required by 40 CFR 58.</p> <p>ADEQ EOY: Data certified</p> <p>EPA EOY: For the certification, Region 6 received the 2009 documentation on March 8, 2010 and appreciates your timely response. For AQS, the data completeness is very good (greater than 75%). We appreciate ADEQs continuous and timely efforts to input data into AQS.</p>	Letter with appropriate AQS reports	<p>Quarterly (no later than 90 days after the end of the calendar quarter) for all pollutants except PAMS VOC data (no later than 180 days):</p> <p>Supporting documentation – 7/1/11</p> <p>CY09 Q3 – 12/31/09</p> <p>CY09 Q4 – 03/31/10</p> <p>CY10 Q1 – 06/30/10</p> <p>CY10 Q2 – 09/30/10</p>
	22	<p>Revise / update QMP & QAPP for Continuous Monitoring.</p> <p>ADEQ EOY: QMP approved 4/15/10 QAPP in finalization process</p> <p>EPA EOY: The QAPP was received on 7/19/10 and revised on 11/19/10. Region 6 appreciates ADEQs continued partnership to finalize the 2010 QAPP. Please note changes to ADEQ's QAPP will be needed for the lead monitoring and analysis portions.</p>	Submit QMP / QAPP	Within one year of latest Approved document.

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	Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
	23	<p>Notify EPA Region 6 of any situation (such as monitor malfunction or data validation issue) that results in missing continuous data of more than 120 consecutive hours or two consecutive non-continuous samples and identify the corrective action taken to minimize the loss of data</p> <p>ADEQ EOY: On going as needed</p> <p>EPA EOY: ADEQ continues to work with Region 6 for any situation that may result in data loss.</p>	Letter or e-mail	As soon as possible, but no more than 14 days after the event
	24	<p>Work with Region to resolve any backlog of flagged critical review records or exceptional events, as necessary.</p> <p>ADEQ EOY: As needed</p> <p>EPA EOY: Since 2008 there have not been exceptional events. ADEQ should submit data of any exceedences for 2010-2011.</p>	Conference calls	Quarterly
	25	<p>Collaborate as needed with the Region, as it performs Technical Systems Audits on 1/3 of Primary Quality Assurance Organizations. Note: States/Locals should conduct Technical Systems Audits of their contract laboratories. ADEQ will ensure adequate QA audits of NAAQS monitors.</p> <p>ADEQ EOY: Audits completed by EPA. Target met</p> <p>EPA EOY: We had the privilege of working with ADEQ staff during the April 2009 TSA. The next TSA is scheduled for fiscal year 2012.</p>	End-of-year review	09/30/10

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	Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
	26	<p>Submit annual network plan required by 40 CFR 58.10.</p> <p>ADEQ EOY: Target met</p> <p>EPA EOY: Region 6 received the Annual Network Plan dated June 29, 2010.</p> <p>Region 6 appreciates ADEQ notifying us in a timely manner for any changes to monitors or sites. We look forward to working with ADEQ with the three additional ozone monitors and the possible relocation of the Fort Smith site.</p>	Network Plan	7/1/10 (unless an alternate schedule is approved.)
	27	<p>Lead source monitors deployed.</p> <p>ADEQ EOY: No source lead monitoring required</p> <p>EPA EOY: Region 6 received your waiver requests including dispersion modeling for source-oriented lead monitoring at six facilities.</p>		1/1/2010
	28	<p>Submit 5-Year Network Assessment required by 40 CFR 58.</p> <p>ADEQ EOY: Report submitted as required</p> <p>EPA EOY: Region 6 received the 5-Year Network Assessment dated July 1, 2010.</p>	5-Year Network Assessment	7/1/10 or alternate schedule as approved
	29	<p>Submit SLAMS data certification reports (Letter, AMP450NC, AMP450 & AMP255) as required by 40 CFR 58</p> <p>ADEQ EOY: Date met</p> <p>EPA EOY: Region 6 received the documentation on March 8, 2010 and appreciates your timely response.</p>	SLAMS Data Certification	Beginning May 1, 2010

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	Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
	30	<p>Submit electronic copies of NSR permits, minor source permits as requested by EPA, Region 6.</p> <p>ADEQ EOY: Ongoing</p> <p>EPA EOY: ADEQ met this commitment.</p>	As requested	Ongoing
	31	<p>Respond to EPA's concerns on implementation of NSR program.</p> <p>ADEQ EOY: Ongoing as necessary</p> <p>EPA EOY: ADEQ met this commitment.</p>	Monthly conference call	Within 90 days of notice from EPA
	32	<p>Issue 78 % of major NSR permits within one year of receiving a complete permit application.</p> <p>ADEQ EOY: Ongoing</p> <p>EPA EOY: ADEQ met this commitment.</p>	End-of-year review	09/30/10
	33	<p>Provide timeliness data on NSR permits issued for new major sources and major modifications by entering data including "the application accepted date" and "the permit issuance date" in to the RBLC national database.</p> <p>ADEQ EOY: Ongoing. Timeliness data is provided in TOPS reports. There is no "application accepted date" in the RBLC; ADEQ will use "application received date".</p> <p>EPA EOY: ADEQ met this commitment.</p>	End-of-year review	09/30/10

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	Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
	34	<p>Issue NSR permits consistent with CAA requirements and enter BACT/LAER determinations in the RBLC. Provide EPA 30 days notification for review of the Draft permits. Respond to EPA concerns prior to issuing the final permit.</p> <p>ADEQ EOY: Ongoing. EPA concerns are addressed in Response to comments.</p> <p>EPA EOY: ADEQ met this commitment.</p>	http://mapsweb.rtpnc.epa.gov/RBLCWebbd/bb102.htm	BACT/LAER database entry within 60 days of final permit issuance.
	35	<p>Provide PSD and nonattainment applications, minor source permits as requested by Region, and draft permits to EPA.</p> <p>ADEQ EOY: Ongoing</p> <p>EPA EOY: ADEQ met this commitment.</p>	Copy of applications and draft permits	As required
	36	<p>Make case by case MACT determinations for all applicable sources under Section 112(g), including appropriate compliance monitoring measures, as appropriate</p> <p>ADEQ EOY: Ongoing</p> <p>EPA EOY: ADEQ met this commitment.</p>	Implement 40 CFR 63 process requirements	As appropriate

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	Item #	Emission Inventory Activity	Reporting Mechanism	Time Frame
	37	<p>Submit the 2008 State-wide emission inventories for criteria pollutants required by the CERR, via CDX, for large point sources.</p> <p>ADEQ EOY: Report sent 5/24/10</p> <p>EPA EOY: We appreciate the State's work in developing and submitting emissions inventories.</p>	Submittal to NEI	06/01/10
	38	<p>Submit available 2008 toxics inventories for large point sources via CDX.</p> <p>ADEQ EOY: HAPS reported for 2008 NEI 5/24/10</p> <p>EPA EOY: We appreciate the State's work in developing and submitting emissions inventories.</p>	Submittal to NEI	06/01/10
	39	<p>Review draft 2007 NEI for Hazardous Air Pollutants (HAPs and criteria air pollutants (CAPs), as appropriate.</p> <p>ADEQ EOY: Not yet published by EPA</p> <p>EPA EOY: We appreciate the State's willingness to review draft NEI data.</p>	End-of-year review	09/30/10

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	Item #	Enforcement/Surveillance Activity	Reporting Mechanism	Time Frame
	40	<p>Submit a Compliance Monitoring Strategy or an update to the strategy, including the number of Major and 80% SM sources.</p> <p>ADEQ EOY: No Change</p> <p>EPA EOY: Agree.</p>	Letter	Annually
	41	<p>Complete the universe of planned inspections / document findings consistent with the compliance monitoring strategy (CMS). Include:</p> <ul style="list-style-type: none"> Identify universe of Majors and 80% SM Complete other compliance monitoring inspections (e.g. PCEs) <p>ADEQ EOY: No Change</p> <p>EPA EOY: The Title V major universe is 208 and the SM-80 universe is 532, per both AR and AFS. FCEs conducted in FY10 were 177 and 394, respectively.</p>	AFS / Inspection Reports	Data input Monthly
	42	<p>Report High Priority Violations to EPA in a timely manner consistent with HPV Policy.</p> <p>ADEQ EOY: Regular scheduled conference calls are held with R6 on the 1st Wed of every month. Timely enforcement actions are discussed during this call.</p> <p>EPA EOY: Agree</p>	HPV conference call	Monthly
	43	<p>State compliance monitoring and enforcement actions are conducted in accordance with federal minimum standards, state law and regulations.</p> <p>ADEQ EOY: In May 2010, EPA R6 completed a State Framework Review which documented that AR includes injunctive relief in all Consent Administrative Orders as required.</p> <p>EPA EOY: Agree</p>	As required	Ongoing

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	Item #	Enforcement/Surveillance Activity	Reporting Mechanism	Time Frame
	44	<p>Enter all required and accurate data (minimum data requirements) into AIRS consistent with the October 1, 2005 Source Compliance and State Action Reporting (SFB83 Supporting Statement):</p> <ul style="list-style-type: none"> Review Database to ensure minimum data requirements are being entered into AFS <p>ADEQ EOY: No Change</p> <p>EPA EOY: Agree</p>	AFS/HPV Conference call	<p>Monthly</p> <p>Ongoing</p>
	45	<p>Enter all required TV annual compliance certification information, including date due, date received, date reviewed, whether deviations were reported (Y/N), and compliance status, into AIRS.</p> <p>ADEQ EOY: No Change</p> <p>EPA EOY: Agree</p>	AFS	Monthly